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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

In the Matter of:	)	
	)	
800 Data Base Access Tariffs and the	)	CC Docket 93-129
	)	
800 Service Management System Tariff	)	

**REPLY COMMENTS OF  
ANCHORAGE TELEPHONE UTILITY**

Anchorage Telephone Utility ("ATU") hereby replies to comments filed by MCI Telecommunications Corporation ("MCI") in CC Docket No. 93-129 pursuant to the Commission's 800 Designation Order.<sup>1/</sup> In its comments, MCI explicitly addresses ATU's direct case on only one issue.<sup>2/</sup> In addition, MCI identifies five areas in which it challenges many or all rate-of-return carriers, which potentially may include ATU.<sup>3/</sup>

MCI's specific reference to ATU's direct case concerns the Commission's request for comment as to the clarity of the terms and conditions of the 800 data base

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<sup>1/</sup> 800 Data Base Access Tariffs and the 800 Service Management System Tariff, Order Designation Issues for Investigation, 8 FCC Rcd. 5132 (1993) ("800 Designation Order.")

<sup>2/</sup> MCI does not originate interstate or international service in ATU's territory. MCI does own 30% of GCI, an Alaskan interstate and international carrier, which did not comment on ATU's direct case.

<sup>3/</sup> Though it is unclear whether these comments regarding rate-of-return carriers are directed at ATU, ATU addresses MCI's comments on each of these five areas as well MCI's direct reference to ATU.

tariffs. MCI comments that ATU offered no support for its statement that the terms and conditions of its 800 data base tariff are consistent with the Communications Act and the Commission's Orders in CC Docket No. 86-10. See MCI Comments at 50. Pertinently, MCI does not allege that ATU's tariff terms and conditions are, in fact, unclear.

Indeed, the terms and conditions of ATU's 800 data base tariff mirror those of the National Exchange Carrier Associations ("NECA") tariff for 800 service. ATU was required by the Commission to adopt the NECA tariff language as part of ATU's withdrawal from the NECA traffic sensitive pool. In adopting this language, ATU found NECA's terms and conditions to be clear, and MCI has offered no argument to the contrary.

Moreover, ATU specifically sought clarification from Commission staff on the request for comment as to the clarity of the terms and conditions of the 800 data base tariffs. Commission staff suggested that ATU simply assert that the terms and conditions of the tariff are sufficiently clear, and let commenting parties demonstrate that they are not. MCI not only has failed to demonstrate any ambiguity in ATU's tariff, it does not even allege that any such ambiguity exists. Not surprisingly, MCI also has failed to identify any provisions in NECA's tariff as unclear.

As noted above, MCI has identified five areas in which it challenges rate-of-return carriers. First, MCI contends that some estimates of unbillable queries are unreasonably high. MCI Comments at 46-47. ATU did not include any unbillable queries in developing its rates, and therefore cannot be subject to MCI's criticism.

Second, MCI contends that "several" LECs that do not own their SCPs failed to indicate whether they intend to flow through any underlying query rate changes to their tariffed query rates. MCI Comments at 47-49. ATU did address this issue in its direct case. See ATU Direct Case at 2. Specifically, ATU confirmed that it intends to flow through any underlying query rate changes to its tariffed query rates.

Third, MCI expresses concerns about area of service ("AOS") routing. It appears that MCI prefers AOS routing as a basic service to the LATA, state, NPA and NPA-NXX levels. MCI Comments at 51-56. ATU is not an SCP provider, and accordingly is not able to categorize AOS routing as a basic feature. If ATU's SCP provider does categorize this service as a basic feature, ATU would also do so.

Fourth, MCI complains that several LECs continue, unreasonably, to bundle vertical and basic features. MCI Comments at 56-57. As previously mentioned, ATU is not a SCP provider and passes through the incremental charges its SCP provider charges ATU for an 800 data base query. ATU's SCP provider charges ATU the same rate for both basic and vertical features, and accordingly ATU charges the same rate for basic and vertical features. If the Commission finds that bundling of basic and vertical features should be changed, ATU will work with its SCP provider to implement that change.

And fifth, MCI complains that most LECs are not sufficiently precise about when they would charge for a query associated with an uncompleted call. ATU's tariff defines an uncompleted 800 call as a call that terminates after a query has been made but prior to identification of the carrier. In such an instance, the interexchange

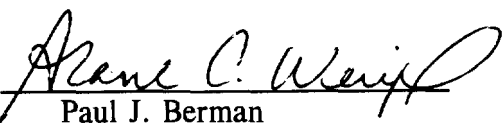
carrier is not billed for the query. Once ATU passes the 800 call off to the interexchange carrier -- that is, once ATU has completed its work in connection with the 800 call -- all appropriate charges are applied, regardless of whether the IXC is able to complete the call now within its control.

CONCLUSION

As the foregoing and ATU's direct case demonstrate, ATU's rates for 800 data base query service are reasonable and fully comply with all FCC Orders.

Respectfully submitted,

ANCHORAGE TELEPHONE UTILITY

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